

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
V.)	Criminal No. 04-10298-DPW
)	
)	
MARKO BOSKIC)	

OFFER OF PROOF CONCERNING ANTICIPATED TRANSLATION
OF SPEECHES FROM OCTOBER 14, 1995 VIDEO

The undersigned were unable to obtain a transcript of the speeches in the video of the one-year anniversary celebration of the 10th Sabotage Detachment. However, set forth below is a description of the events and speeches, that is based on a review of the video with an FBI linguist whose native tongue is Serbo-Croatian.

The first screen, that contains the title, identifies the video as a film of the 10th Sabotage Squad's one year of existence. The film was made in Vlasenica on October 14, 1995, and was filmed by Ozrenko Draskic.

The patch for the 10th Sabotage Unit is then displayed. The patch depicts the letters "SRS," that is the sign for the Army of the Republic of Srpska.

The next footage shows the two lines of formation of the members of the Unit. The defendant is in the first line, and is applauding when first seen.

The first speaker appears to be reading from official documents, articles or proclamations. He identifies them by

their numbers. The specific articles give him the authority to proclaim praise for specific soldiers and to promote them. The first orders provide for promotions for Franz Kos of the Bijelina barracks and Jokic of the Vlasenica barracks. The orders are signed by Radovan Karadic¹. The second are for promotions for Drazen Erdemovic and two others.

Each of the five soldiers comes up and receives an award and congratulations from the officers.

General Krstic then speaks.² He greets and praises the brave Serb fighters of the Sabotage Squad. He tells them that they have shown someone how one is supposed to fight. Everything they accomplished they did without losses. We have a plan for operations of wider measures in the future. This calls for a need to form different units within existing units of the Corps.

The General tells them that they are in the process of forming a Sabotage Squad within the Drina Corps.³ We spoke about this a little while ago with your commander. He said that's good; now we will be able to compete. He said I accept that and

¹Radovan Karadic was the head of the Serbian Democratic Party, and General Mladic's supervisor. Mladic is head of the Main Staff of the Army of the Republic of Srpska and it is to the Main Staff that the 10th Sabotage reported.

²Although not a transcription, the description of what the speakers said is set out in a first person narrative form.

³Krstic was head of the Drina Corp. The Drina Corp was the military corp that encompassed the area of Bosnia that included Vlasenica.

have us come out as soon as possible, so we can come out and fight.

The General tells them that they probably heard that the Drina Corps is involved in serious fighting against a serious enemy planning an offensive attack on Tuzla, Zvornik and Zivinice. We have successfully broken the offensive and caused great losses to the enemy, and didn't let them take even one foot of our territory. We broke their offensive with minimal losses. For us even the smallest casualty is a great loss. However, when we succeed it is easier to accept our casualties.

Fighters of the Drina Corps with you and other fighters in this area will not give up a foot of our territory to the enemy. Our Corp is defending areas, helping the 1st and 2nd Corps break the offensive of the Muslims and Croats in the Western part of the Republic of Srpska. We are not taking this lightly. I can inform you that the lines of defense are stable. I'm convinced, and don't let it fool you, that this truce will last. The whole situation will escalate quickly, which requires us to be prepared in full - to be on full alert. We have to be ready to respond to any serious attack by the enemy.

The General concludes by once again congratulating you on this day of the formation of the Unit and I wish you all the best in your private life and health, and you should accomplish everything that's given to you.

The Commander of the 10th Sabotage Detachment, Milorad Pelemis, then states that in the name of the commander of the Republic of Srpska, General Krstic will hand over the flag of the Republic of Srpska to the Sabotage Unit.

General Krstic states that he hands over the war flag and let it be a guide to you in future successes and fight with the enemy. Never let the flag fall into enemies' hands.

Another speaker then states that he joins in the congratulations that the commander already gave, and wishes more success to this Unit in the future, to win in the end.

Following the speeches, members of the Unit talk about some of their weapons, including various rifles, scopes, binoculars, night visions equipment and detonators.

Following a demonstration of some martial arts and other military moves, the camera briefly interviews two soldiers. The soldiers then return towards the area of the original formation seen at the beginning of the video. Most of the members of the Unit who were in formation are still there, but are standing more casually; some are smoking cigarettes.

At trial, we anticipate either reaching a stipulation with the defense concerning a transcription and translation of the above, or presenting a translation of the speeches through testimony.

The government believes that the entire video is relevant and admissible, particularly all the sections described above.

Respectfully submitted,

For the United States:

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Jeffrey Auerhahn
JEFFREY AUERHAHN
KIMBERLY P. WEST
Assistant U.S. Attorneys

Dated: June 21, 2006

CERTIFICATE OF SERVICE

I hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

/s/ Jeffrey Auerhahn
Jeffrey Auerhahn
Assistant U.S. Attorney